

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Kelly C. Marlin-Peroni  
Brian M. Peroni

Debtors

Toyota Lease Trust

Movant

vs.

Kelly C. Marlin-Peroni  
Brian M. Peroni

Debtors

William C. Miller, Esquire

Trustee

CHAPTER 13

NO. 18-13803 ELF

11 U.S.C. Section 362

**STIPULATION**

AND NOW, it is hereby stipulated and agreed by and between the undersigned as follows:


1. The Secured Property is a 2017 Toyota Camry, VIN: 4T1BF1FK9HU408499
2. Debtor has surrendered the Secured Property to Secured Creditor in December 2019.
3. Debtor stipulates and agrees that, upon the Court's approval of this Stipulation, Movant shall be granted relief from the automatic stay to take possession and sell, lease, and otherwise dispose of the Secured Property in a commercially reasonable manner.
4. The parties agree that a facsimile signature shall be considered an original signature.

Date: January 23, 2020

/s/ Rebecca A. Solarz, Esq.

Rebecca A. Solarz, Esq.  
Attorney for Movant

Date: 4/17/2020

  
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John M. Kenney, Esquire  
Attorney for Debtors

Date: 4/20/2020

/s/ LeRoy Wm. Etheridge, Esq. for  
William C. Miller, Esquire  
Chapter 13 Trustee

NO OBJECTION  
\*without prejudice to any  
trustee rights and remedies.

Approved by the Court this \_\_\_\_ day of \_\_\_\_\_, 2020. However, the court retains discretion regarding entry of any further order.

\_\_\_\_\_  
Bankruptcy Judge  
Eric L. Frank